

ATTACHMENT A

AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A SEARCH WARRANT

I, Frank H. Figgers, III, Task Force Officer, United States Postal Inspection Service, having been duly sworn under oath, state as follows:

1. Your affiant is a certified police officer employed full time with the Virginia State Police and holds the rank of Special Agent. I am currently assigned as a Task Force Officer with the United States Postal Inspection Service (“USPIS”) assigned in the Roanoke, Virginia Domicile. I am authorized to investigate criminal and civil matters related to the United States Postal Service and the mails; serve warrants and subpoenas; make arrests; carry firearms; make seizures of property; administer oaths; and perform such other official duties as may be established by the Chief Postal Inspector. I have been employed as a sworn officer with the Virginia State Police since January 1989 and have worked the drug interdiction arena with the Virginia State Police since 2003. My work has included highway drug interdiction and parcel interdiction at other commercial parcel businesses. I have received formal training in conducting criminal investigations into drug trafficking and money laundering organizations that utilize the United States Postal Service (“USPS”). During my tenure as a Special Agent, I have conducted and participated in numerous investigations of criminal activity that have violated both federal and state law.

2. I know based on training and experience that the U.S. Mail is often used by drug trafficking organizations to transport controlled substances and proceeds from the sale of controlled substances. I know based on training and experience that USPS Priority Mail and

Priority Mail Express are commonly used to transport controlled substances, and drug trafficking proceeds, because drug traffickers can track parcels, control dispatch times and locations, and have a guarantee of delivery in one to three days.

3. This affidavit is submitted in support of an application for a search warrant of a USPS Priority Mail parcel bearing tracking number “9505 5152 4551 2216 2627 74” for controlled substances and/or the proceeds from drug trafficking. The parcel (hereafter referred to as Parcel #1) is described as follows:

- a. Addressee: Rayshaun Jones, 1606 Salem Ave SW, Roanoke, VA 24017 and 1606 Syracuse Ave NW, Roanoke, VA 24017
- b. Return Address: Alexis Gonzalez, 28630 Capano Bay Ct., Menifee, CA 92584
- c. Postage Affixed: Origin: Menifee, CA, Postage: \$54.50, Date: AUG 4, 2022
- d. Tracking Number: 9505 5152 4551 2216 2627 74 (Parcel #1)
- e. Description: Brown cardboard box bearing dimensions 15” x 12” x 10”
- f. Weight: 5 pounds 11.30 ounces

5. On August 8, 2022, your affiant took custody of Parcel #1. Parcel #1 was mailed from Menifee, CA to Roanoke, VA. California is a known source area for parcels containing controlled substances mailed into the Western District of Virginia. Parcel #1 is a brown cardboard box bearing a USPS Priority Mail postage paid label and a handwritten return address of 28630 Capano Bay Court, Menifee, CA 92584. Parcel #1 was mailed from the Romoland Station Post Office located in Menifee, CA and postage paid in cash. The recipient is listed as Rayshaun Jones, 1606 Salem Ave SW, Roanoke, VA 24017 on the handwritten label. The address listed on the USPS Priority Mail postage label is 1606 Syracuse Ave, Roanoke, VA 24017. The ZIP Code on the handwritten label is incorrect and should be “24016.” Based on the handwritten label the

intended delivery address appears to be 1606 Salem Avenue SW, Roanoke, VA 24016. A name is not listed on the USPS Priority label. A photograph of Parcel #1 is attached as Exhibit #1.

6. A search of postal records revealed two (2) previous parcels mailed from Menifee, CA to the destination address of 1606 Salem Ave SW, Roanoke, VA 24016. These previous parcels weighed (3.7) and (3.8) pounds and were mailed on June 21, 2022 and June 30, 2022, respectively. The previous parcel mailed on June 21, 2022 listed the sender as “Alexis Gonzalez,” with a return address of 27935 Lemonwood Drive, Menifee, CA 92584. Alexis Gonzalez could not be associated with the Lemonwood Drive address. A search of postal records did not reveal any previous parcels being mailed to 28630 Capano Bay Court, Menifee, CA 92584 from the Roanoke, VA area.

7. I utilized CLEAR to conduct searches for information related to Parcel #1. Your affiant was able to determine through CLEAR that a L.S. resides at 1606 Salem Avenue SW, Roanoke, VA 24016 as recently as March 2022. A CLEAR search for the recipient’s name, “Rayshaun Jones,” was not able to be associated to destination address 1606 Salem Avenue SW, Roanoke, VA 24016 or 1606 Syracuse Avenue NW, Roanoke, VA 24017. A CLEAR Search of the shipper’s name “Alexis Gonzalez,” could not be associated with 28630 Capano Bay Court, Menifee, CA 92584. CLEAR reports a person by the name of M.V. residing there as recently as April 2022. A CLEAR search indicates that “Alexis Gonzalez” is associated with the address of 29680 Cottonwood Cove Drive, Menifee, CA 92584 as recently as August 2022. The Cottonwood Cove address is approximately 5 miles from the 28630 Capano Bay Court address. Based on your affiant’s training and experience, this type of mailing pattern from a fictitious shipping address or fictitious name can be indicative of drug trafficking through the U.S. Mail.

8. On August 8, 2022, your affiant requested a narcotic detection canine from the Virginia State Police. Trooper T.S. Easter, and his narcotic detection canine, “HAVOC,” responded to the USPS Roanoke Processing and Distribution Center located at 419 Rutherford Avenue NE, Roanoke, Virginia 24022. Parcel #1 was placed in a blind parcel line-up and subjected to an exterior search by Canine “HAVOC.” Trooper Easter advised your affiant at approximately 8:45 a.m. that Canine “HAVOC” alerted to Parcel #1. According to Trooper HAVOC, this positive alert meant Canine “HAVOC” detected the odor of an illegal drug emanating from Parcel #1. A supporting affidavit of the narcotics detection training completed by Trooper Easter and Canine “HAVOC” is provided as Exhibit #2.

9. Based on the facts set forth in this affidavit, I respectfully submit that probable cause exists to believe that the USPS Priority Mail Express parcel bearing tracking number “9505 5152 4551 2216 2627 74,” addressed to “Rayshaun Jones, 1606 Salem Avenue SW, Roanoke, VA 24017, also 1606 Syracuse Ave NW, Roanoke, VA 24017” bearing a return address of “Alexis Gonzalez, 28630 Capano Bay Court, Menifee, CA 92584,” contains controlled substances, and/or the proceeds which are evidence thereof, and/or contraband, in violation of Title 21, United States Code, Sections 841(a)(1) and 843(b).

Frank H. Figgers, III
Frank H. Figgers, III
Task Force Officer, USPIS

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by reliable electronic means; specifically, by telephone, on the 8th day of August, 2022.

Robert S. Ballou

The Honorable Robert S. Ballou
United States Magistrate Judge
Western District of Virginia